

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

MDL No. 2323

SHORT FORM COMPLAINT

This Relates to:

**Plaintiffs' Master Administrative Long-
Form Complaint and (if applicable)
Matthew Lawrence v. NFL, USDC, EDPA
No. 12-cv-02728**

**IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION**

JURY TRIAL DEMANDED

MATTHEW LAWRENCE

SHORT FORM COMPLAINT

1. Plaintiff, **MATTHEW LAWRENCE**, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.

2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order no. 2, filed April 26, 2012.

3. Plaintiff incorporates by reference the allegations (as designated below) of the Master Administrative Long-Form Complaint, as may be amended, as if fully set forth at length in this Short Form complaint.

4. NOT APPLICABLE.

5. Plaintiff, **MATTHEW LAWRENCE**, is a resident and citizen of Owings Mills, Maryland, and claims damages as set forth below.

6. NOT APPLICABLE.

7. On information and belief, the Plaintiff sustained repetitive, traumatic sub-concussive and/or concussive head impacts during NFL games and/or practices. On information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. On information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.

8. The original complaint by Plaintiff in this matter was filed in the United States District Court for the District of Maryland.

9. Plaintiff claims damages as a result of [check all that apply]:

- ☒ **Injury to Herself/Himself**
- ☐ Injury to the Person Represented
- ☐ Wrongful Death
- ☐ Survivorship Action
- ☒ **Economic Loss**
- ☐ Loss of Services
- ☐ Loss of Consortium

10. NOT APPLICABLE.

11. ☐ Plaintiff reserves the right to object to federal jurisdiction.

DEFENDANTS

12. Plaintiff brings this case against the following Defendants in this action [check all that apply]:

_____ National Football League

_____ NFL Properties, LLC

_____ Riddell, Inc.

_____ All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)

_____ Riddell Sports Group, Inc.

_____ Easton-Bell Sports, Inc.

_____ Easton-Bell Sports, LLC

_____ EB Sports Corporation

_____ RBG Holdings Corporation

13. NOT APPLICABLE

14. NOT APPLICABLE

15. Plaintiff played in X the National Football League (“NF”) and/or in _____ the American Football League (“AFL”) during 1965-74 for the following teams: Baltimore Ravens, member club of the NF from 2008 through 2012.

16. Plaintiff herein adopts by reference the following Counts of the Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:

___▶_ Count I (Action for Declaratory Relief – Liability (Against the NFL))

___▶_ Count II (Medical Monitoring (Against the NFL))

_____ Count III (Wrongful Death and Survival Actions (Against the NFL))

- ☐ ► Count IV (Fraudulent Concealment (Against the NFL))
- ☐ ► Count V (Fraud (Against the NFL))
- ☐ ► Count VI (Negligent Misrepresentation (Against the NFL))
- ☐ Count VII (Negligence Pre-1968 (Against the NFL))
- ☐ Count VIII (Negligence Post-1968 (Against the NFL))
- ☐ Count IX (Negligence 1987-1993 (Against the NFL))
- ☐ Count X (Negligence Post 1994 (Against the NFL))
- ☐ Count XI (Loss of Consortium (Against the NFL))
- ☐ Count XII (Negligent Hiring (Against the NFL))
- ☐ Count XIII (Negligent Retention (Against the NFL))
- ☐ Count XIV (Strict Liability for Design Defect (Against the Riddell Defendants))
- ☐ Count XV (Strict Liability for Manufacturing Defect (Against the Riddell Defendants))
- ☐ XVI (Failure to Warn (Against the Riddell Defendants))
- ☐ Count XVII (Negligence (Against the Riddell Defendants))
- ☐ ► Count XVIII (Civil Conspiracy/Fraudulent Concealment (Against All Defendants))

17. Plaintiff asserts the following additional causes of action [write in or attach]:

☐ Plaintiff incorporates by reference his Complaint, and all allegations and claims presented within that Complaint, filed in the United States District Court for the District of Maryland as though fully restated here.

PRAYER FOR RELIEF


WHEREFORE, Plaintiff prays for judgment as follows:

- A. An award of compensatory damages, the amount of which will be determined at trial;
- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose laws will govern this action;
- D. For medical monitoring, whether denominated as damages or in the form of equitable relief;
- E. For an award of attorneys' fees and costs;
- F. An award of prejudgment interest and costs of suit.
- G. An award of such other and further relief as the Court deems just and proper.

JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff hereby demands a trial by jury.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nathaniel Fick", is written over a horizontal line.

NATHANIEL FICK
Fick & May
1426 E. Joppa Road
Baltimore, MD 21286
Phone: 410-321-6000
Fax: 410-321-5707
E-Mail: nfick@neurolaw.com

Attorneys for Plaintiff